

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

DWAYNE REED #487837,

Plaintiff,

NO. 2:17-cv-156

v

HON. ROBERT J. JONKER

CORIZON, MICHIGAN DEPARTMENT  
OF CORRECTIONS BUREAU OF  
HEALTHCARE SERVICES, BRENDA  
BUCHANAN, and JENNIFER  
HEADLEY,

MAG. TIMOTHY P. GREELEY

Defendants.

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Dwayne Reed #487837  
*In Pro Per*  
Parnall Correctional Facility  
1780 E. Parnall  
Jackson, MI 49201

CHAPMAN LAW GROUP  
Ronald W. Chapman (P37603)  
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Assistant Attorney General  
Attorney for MDOC Defendant Headley  
Michigan Department of Attorney General  
State Operations Division  
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Lansing, MI 48909  
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**DEFENDANT JENNIFER HEADLEY'S  
MOTION FOR SUMMARY JUDGMENT**

Defendant Jennifer Headley, through the undersigned attorney, bring this motion under Fed. R. Civ. P. 56(a), and move the Court to enter its order granting summary judgment in Defendant's favor, based on the grounds set forth in Defendant's accompanying brief.

Defense counsel sought concurrence from Plaintiff's counsel on October 9, 2018 and concurrence was not granted.

Respectfully submitted,

Bill Schuette  
Attorney General

s/ Kristen D. Simmons (P76293)  
Assistant Attorney General  
Attorney for MDOC Defendants  
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Dated: November 9, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2018, I electronically filed the foregoing paper with the Clerk of the Court using ECF system which will send notification of such filing as well as via US Mail to all non-ECF participants.

/s/ Kristen D. Simmons  
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